

## FDD-PST

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**From:** Don\_Williams@douglas.k12.ga.us  
**Sent:** Thursday, April 27, 2000 11:12 AM  
**To:** fdd-pst@fns.usda.gov  
**Subject:** Comments on BPR

Microsoft Word 4

Please consider the attached comments.  
Thanks, Don Williams

(See attached file: Bprltr.doc)

**DOUGLAS COUNTY SCHOOL SYSTEM  
P. O. Box 1077  
Douglasville, GA 30133  
(770) 920-4040 FAX (770) 920-4044**

**April 24, 2000**

**FD2000 Project Coordinator  
Food Distribution Division – FNS  
3101 Park Center Drive  
Ford Avenue Bldg. – Room 601  
Alexandria, VA 22302**

**I am a staunch supporter of the USDA commodities program. Our program managers and I see on a daily basis what role commodities play in providing quality nutritious meals for our students.**

**We applaud USDA for taking the initiative to re-vamp the distribution system so as to improve its effectiveness. After attending the ACDA conference and after carefully studying the sixteen proposals, I am in total support of the majority of them. Some of the proposals, however, cause me great concern:**

- (1) To allow vendors the use of commercial labeling without a USDA identifier will create problems for which we have been unable to find solutions. How can we possibly be in compliance with OMB Circular A-133, Audits of States, Local Governments and Non-Profit Organizations if we are unable to identify commodities? Who is going to monitor at the distributor level to see that RA's are receiving the appropriate quality of product?**
- (2) We are opposed to the full substitutability provision. We do not feel the USDA should allow the use of imported products in commodities. Also, we are concerned that substituted products will not meet the specifications of those we are accustomed to.**
- (3) The proposal to "blend" product specifications with industry standards has the potential of destroying the nutritional**

**integrity of commodities we have worked for so diligently for several years. A watering down of current high standards for commodities is inevitable.**

- (4) The provision for computer connectivity to the school district level is a great step forward. However, we feel the state distribution agencies should maintain the current level of coordination of the distribution process. They are in a position to see the overall performance statewide and, therefore, assist in making wiser decisions concerning the acquisition of commodities. If there are states that are not effective with this process, then those states should be dealt with on an individual basis and held accountable.**

**Additionally, we would like to be assured that pilots will be evaluated objectively by unbiased sources and the empirical results made available to us. We are concerned about the potential for conflict of interest in the evaluation process.**

**Don R. Williams  
Director of Food Services  
dwilliams@douglas.k12.ga.us**

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